

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION
3:20-cv-00504-FDW-DSC

CPI SECURITY SYSTEMS, INC.,

Plaintiff,

Vs.

VIVENT SMART HOME, INC. f/k/a
MOSAIC ACQUISITION CORP.; LEGACY
VIVENT SMART HOME, INC. f/k/a
VIVENT SMART HOME, INC.,
Defendants.

_____ /

ZOOM VIDEO/TELEPHONIC DEPOSITION OF ALLINE F. MAXWELL

August 30, 2021

11:52 a.m.

* * *

Taken By the Defendants
remotely By
Zoom Video Conferencing

Reported By:
Taura J. Vulcano, CSR, RPR

1 A. (Unintelligible) it was -- it was normal
2 circumstances, I would have thought that. Other
3 than normal situations, I don't know.

4 Q. Okay. And Alline, why did you switch
5 from CPI to Vivent? What were the actual reasons
6 you switched?

7 A. It was because -- the main reason was
8 the door, the front doorbell, okay? I never could
9 get them to get it right.

10 Q. Uh-huh.

11 A. And then another -- the other thing was
12 the -- the racial thing that the man said about
13 black people --

14 Q. Alline --

15 A. -- on TV. I didn't hear it, but my
16 neighbors did.

17 Q. Okay. And, Alline, why were you upset
18 about the racial comments made about black people
19 by CPI's CEO?

20 A. I mean, this -- I know this type of
21 thing goes on all the time. I'm not crazy and I'm
22 not stupid. I'm 79 years old, and I've been
23 through some of that shit. And anyway, because
24 what he said was not true. Because we -- a lot of
25 black people got education more so than some white

1 people have.

2 Q. Uh-huh.

3 A. That's the reason I got upset.

4 Q. I see --

5 A. Because they all throwing it out there.

6 Q. Okay. And my last question for now,

7 Alline, did you like the Vivent system and

8 customer service more than CPI's equipment and

9 customer service?

10 A. I never spoke to Vivent about anything

11 like that --

12 Q. Okay. So did you --

13 A. -- anything about their material,

14 anything about their equipment.

15 Q. Okay. So you never had issues with
16 Vivent's equipment; is that what you're saying?

17 A. Yes.

18 Q. Okay. But did you like the Vivent
19 equipment better than the CPI equipment?

20 A. Yes, I do -- yes, I did.

21 Q. Okay. Great. Thanks, Alline. Those
22 are all of my questions for now.

23 A. All right.

24 RE-EXAMINATION BY MR. HOBBS

25 Q. Mrs. Maxwell, I just have a couple